

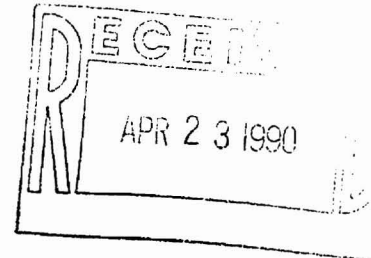


APR 2 1990

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Reply To
Attn Of: HW-112

CERTIFIED MAIL-RETURN RECEIPT REQUESTED



Richard D. Zweig
Chem-Security Systems, Inc.
Star Route, Box 9
Arlington, Oregon 97812-9709

Dear Mr. Zweig:

This letter is in response to Chem-Security Systems, Inc.'s (CSSI) March 2, 1990, letter requesting revision of the May 22, 1987, as amended, Temporary PCB Disposal Approval, to include Cells 3 and 5 of Landfill L-13, because of a shortage in landfill capacity and a delayed issuance of the renewal of the PCB Letter of Approval. I have decided to revise the conditionally granted May 22, 1987, as amended, Temporary PCB Disposal Approval for disposal of PCB waste in Landfill L-13 to include Cells 3 and 5.

Condition 1, of the Temporary PCB Disposal Approval, is hereby amended, effective immediately as follows:


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- (1) The disposal of PCBs, as defined by 40 CFR §761.2 (incorporated herein by reference), in Landfill L-13 shall be restricted to Cells 1 and 2, as depicted on Drawing No. 1 Project No. 233-07.00, to Cells 4 and 6, as depicted on Sheet 3, Work Order No. 6435-S, and to Cells 3 and 5, as depicted on Sheet 1, Work Order No. 6435-S. PCB shall be disposed in Landfill L-13 in accordance with 40 CFR §761.60 and the following operational procedures/restrictions:
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- (b) Pursuant to §761.75(c)(3)(ii), in order to ensure that operations in Cells 1, 2, 3, 4, 5, and 6 of Landfill L-13 do not present an unreasonable risk of injury to health and environment from PCBs, the following requirements, to the extent they are applicable to operations in Cells 1, 2, 3, 4, 5, and 6 of Landfill L-13, must be met (for simplification purposes, the analogous RCRA regulatory language is referenced):

i. Sections 265.13-265.17, 265.31-265.35, 265.37, 265.51-265.56, 265.111-265.120, 265.141-265.150, 265.302, 265.309, 265.310, 265.312, 265.313, 265.314(b), 265.314(c)(1), 265.314(c)(3), 265.314(d), 265.314(f), and 265.315 under Part 265--INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE, AND DISPOSAL FACILITIES. In complying with these sections CSSI shall read "hazardous wastes(s)" as "PCB(s)" whenever it appears.

. . . .

- (d) The groundwater monitoring program for Landfill L-13 shall be as designated in CSSI's Final RCRA Permit No. ORD089452353 Part IX (except to the extent that Part IX is pending final EPA action on CSSI's petition for appeal of portions of Part IX), with addition that Landfill L-13's groundwater monitoring system will also be sampled and analyzed for PCBs on an annual basis. To the extent CSSI is not following Part IX, awaiting final EPA action on CSSI's petition, Condition 1(b) above, shall also include reference to "Section 265.90-265.94". The first sampling event for these parameters must take place prior to placement of any PCBs in Landfill L-13. The results of these PCB analysis and water elevation levels should be submitted to EPA within thirty days of receipt by CSII of analytical results from the laboratory, which is not to exceed 120 days of each sampling event. A written record of sampling and laboratory analysis results shall be maintained on-site. Sampling methods and analytical procedures for the parameter PCBs in Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods, EPA Publication SW-846. In addition, any laboratory performing chemical tests for the operation of Landfill L-13 shall be a participant in EPA's Performance Evaluation Sample Program for analytical quality control.

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- (l) The secondary leachate collection system for Landfill L-13's Cells 1, 2, 3, 4, 5, and 6 shall be operated in accordance with the procedures specified in CSSI's Final RCRA Permit No. ORD089452353 Condition VI.B.(7).
- (m) The leachate collection system for Landfill L-13's Cells 1, 2, 3, 4, 5, and 6 shall be checked for the presence of liquid at least once every business day. If any liquid is found in the leachate collection system, the system should be pumped to sustain the height of leachate at no greater than one foot. 

A chronological record should be maintained on-site of the results of the checks on the leachate collection system and of any pumping activity, including leachate level prior to pumping, quantity of leachate pumped, and level of leachate after pumping.

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- (o) Disposal in Cells 1, 2, 3, 4, 5, and 6 of Landfill L-13 of RCRA wastes, RCRA/PCB waste mixtures, and PCB wastes must be conducted so that it does not:

- i. Generate extreme heat or pressure, fire or explosion, or violent reaction;
- ii. Produce uncontrolled toxic mists, fumes, dust, gases in sufficient quantities to threaten human health;
- iii. Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions;
- iv. Damage the structural integrity of the device or facility containing the waste, or
- v. Through other like means threaten human health or the environment.

Disposal of RCRA wastes, RCRA/PCB waste mixtures and PCB wastes meeting the characteristic of ignitability as defined under 40 CFR §261.21 and which are in the form of a non-liquid as demonstrated by the absence of free liquids using Method 9095 (See Condition 1(c) for complete reference of method) are not precluded for land disposal by 40 CFR §761.75(b)(8)(iii) and are authorized for disposal in Cells 1, 2, 3, 4, 5, and 6 of Landfill L-13, if not precluded pursuant to 40 CFR Part 268, when managed in accordance with the practices designated in §265.312 under Condition 1(b) above.

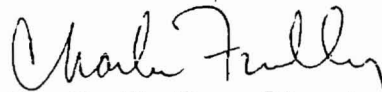
- (p) Approval of PCB disposal in Landfill L-13 Cells 1, 2, 3, 4, 5, and 6 shall continue until a final determination is issued by EPA (and effective) in response to CSSI's request for reissuance of this approval. The Regional Administrator or a designated representative may act at any time to extend, alter, amend, modify, suspend, or revoke this approval as he deems necessary or appropriate. The Director, Hazardous Waste Division, EPA Region 10 is duly authorized and the "designated representative" of the Regional Administrator for the purposes of this approval.

If EPA ultimately makes a determination not to reissue this approval, CSSI must immediately cease placement of PCB wastes in Landfill L-13 and must then either complete final closure on the portion of Landfill L-13 utilized for PCB disposal or must then remove all PCBs from Landfill L-13. If CSSI elects the closure option, it must place a 10 foot wide soil dike separating the portion of Landfill L-13 utilized for PCBs from the unused portion

of the trench. The 10 foot wide dike would have to be certified to be structurally sound, and to have a permeability of no greater than 1×10^{-7} cm/sec. Supporting documentation for the certification must, at a minimum, include an as-built drawing, construction procedures, stability analysis, compaction data and permeability data.

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All correspondence or inquiries on this matter should be directed to Catherine Massimino of my staff, at (206) 442-4153.

Sincerely,



Charles E. Findley, Director
Hazardous Waste Division

cc: T. Virnig, CSSI
B. McKnight, Department of Environmental Quality (DEQ)
B. Long, Oregon Operations Office (OOO)